

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
PLAINTIFF)	
v.)	Case No. 07 CR 843-13
)	
)	Judge Sidney Schenkier
TERRANCE SEWELL,)	
)	
DEFENDANT)	

**DEFENDANT SEWELL'S EMERGENCY MOTION FOR A MODIFICATION OF
TERMS OF RELEASE ON BOND**

Now comes Defendant Terrance Sewell, by and through his attorney and moves this Court to modify the terms of his release to change the place of his residence to his mother and sister's apartment at 3824 W. Grenshaw, 2nd Fl., Chicago, Illinois 60649 and to remove Sandy Smith as one of his third party custodians and add his mother Laverne Sewell, his mother. In support of this motion, Defendant states the following.

1. This Court placed Mr. Sewell on bond with one principal condition that he be on home incarceration. He is complying with the terms of his release.

2. Mr. Sewell wishes to change the location of his residence from that of Sandy Smith's apartment to his mother's apartment at 3824 W. Grenshaw, 2nd Fl., Chicago, Illinois because that is a more suitable place for him to reside. Ms. Smith is apparently turning off the telephone so electronic monitoring will no longer be possible at that location. For this reason, Defendant requests an emergency hearing tomorrow.

3. Defendant's attorney has not yet had the opportunity to discuss this change with Mr. Sewell's supervised release officer, Pace Morrison, but based on previous discussions, believes that he is supportive of this proposed change.

4. Mr. Sewell's attorney has not yet been able to contact one of the AUSA's in this case to determine if the Government objects.

WHEREFORE DEFENDANT Sewell prays that this Court grant his motion to modify the conditions of his pretrial release to change the location of his residence as stated above.

Respectfully submitted,

s/Steven Saltzman
Attorney for Defendant Sewell

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